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12 ADVENTIST HEALTHCARE/WEST

13  
14 UNITED STATES DISTRICT COURT

15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 TRACY ROUSSEAU and STAN  
17 ROUSSEAU

18 Plaintiffs,

19 v.

20 ST. HELENA HOSPITAL; AND  
21 ADVENTIST HEALTHCARE/WEST,

22 Defendants.

Case No. 4:17-cv-02985 HSG

Civil Rights

**STIPULATION AND ORDER TO  
CONTINUE THE DEADLINE TO  
COMPLETE MEDIATION**

Action Filed: May 24, 2017

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24  
25 **STIPULATION**

26 Plaintiffs TRACY ROUSSEAU and STAN ROUSSEAU (“Plaintiffs”) and Defendants  
27 ST. HELENA HOSPITAL and ADVENTIST HEALTHCARE/WEST (“Defendants”) –  
28 Plaintiffs and Defendants together the “Parties” – hereby stipulate and request that the Court

1 extend the deadline for the Parties to complete mediation under General Order 56, based upon  
2 the following Good Cause:

- 3 1. Plaintiffs filed this action on May 24, 2017. Dkt. No. 1.
- 4 2. The Court order the case into General Order 56 on May 24, 2017. Dkt. No 4.
- 5 3. The Parties stipulated to forego a site inspection due to the nature of injunctive  
6 relief at issue in the case and engage in early mediation under the General Order  
7 56. Dkt. No. 17.
- 8 4. The case was referred to mediation on July 18, 2017, and assigned to mediator  
9 Eric Ivary on August 10, 2017. Dkt. No. 20.
- 10 5. The Court set a deadline to complete the mediation of October 11, 2017.
- 11 6. The Parties have been working cooperatively within the parameters of General  
12 Order 56 to resolve Plaintiffs' claims, including participating in a productive  
13 mediation on October 3, 2017. Dkt. No. 22.
- 14 7. On October 3, 2017, Mediator Eric Ivary filed a Certification of ADR Session  
15 which stated that further facilitated discussions were expected. *Id.*
- 16 8. The Parties wish to continue facilitated settlement discussions under the  
17 parameters of General Order 56. The parties have created a process for mediation  
18 that anticipates resolving the issues in stages.
- 19 9. The Parties therefore stipulate and request that the Court Order the deadline to  
20 complete mediation under General Order 56 be extended to December 29, 2017.

21 **IT IS SO STIPULATED.**

23 Dated: October 3, 2017

DERBY, McGUINNESS & GOLDSMITH, LLP

25 /s/ Celia McGuinness  
26 By: CELIA McGUINNESS, ESQ.  
27 Attorneys for Plaintiffs  
28 TRACY ROUSSEAU and STAN ROUSSEAU

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Dated: October 3, 2017

POLLARA LAW GROUP

/s/ Dominique A. Pollara  
By: DOMINIQUE A. POLLARA, ESQ.  
Attorneys for Defendants  
ST. HELENA HOSPITAL and  
ADVENTIST HEALTHCARE/WEST

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**ORDER**

Pursuant to the stipulation of the parties, and for good cause shown, it is hereby  
ORDERED that deadline for the parties to complete mediation through General Order 56 shall be  
December 29, 2017.

**IT IS SO ORDERED.**

Dated: October 4, 2017

  
Honorable Haywood S. Gilliam, Jr.  
United States District Court Judge